

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) GEORGE COLLINS and)	
(2) ALRIKA COLLINS,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 22-cv-00318-RAW-JAR
)	
(1) STATE FARM FIRE AND)	
CASUALTY COMPANY,)	
)	JURY TRIAL DEMANDED
Defendant.)	
)	

MOTION FOR ENTRY OF AN AGREED PROTECTIVE ORDER

COMES NOW the Plaintiffs, George Collins and Alrika Collins, and the Defendant, State Farm Fire and Casualty Company, by and through their respective attorneys of record, and hereby requests this Court to enter an Agreed Protective Order.

1. The Plaintiffs brought this action against Defendant, seeking to recover for alleged breach of insurance contract and an alleged breach of the implied duty of good faith and fair dealing.

2. The nature of Plaintiffs' allegations and Defendant's denials and defenses require Defendant to disclose and exchange discovery documents and information which Defendant considers confidential, private, proprietary and trade secrets. Counsel for Plaintiffs and Defendant have conferred regarding these concerns and have agreed on a proposed Protective Order.

3. A copy of the Agreed Protective Order is being produced pursuant to the ECF Guidelines, via the ECF email address for proposed orders.

4. The parties respectfully request this Court enter the Agreed Protective Order of record in this action.

WHEREFORE, premises considered, the parties respectfully request that this Court grant the parties' Joint Motion for Entry of an Agreed Protective Order and enter the proposed Agreed Protective Order.

Respectfully submitted,

**ATKINSON, BRITTINGHAM,
GLADD, FIASCO & EDMONDS**
A PROFESSIONAL CORPORATION

/s/ J. Andrew Brown

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of April, 2023, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/ s/ J. Andrew Brown

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